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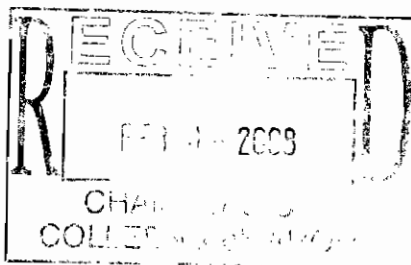
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MEMO ENDORSED

February 4, 2008

**VIA FACSIMILE**

Hon. Colleen McMahon
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*Grant
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Signed*

Re: *New York Rebar Installation, Inc., et al. v. Robert Ledwith, et al.*
07 Civ. 7607 (CM)

Dear Judge McMahon:

We represent the defendants/counterclaim plaintiffs in the above-entitled action and are writing this letter on behalf of all parties, in accordance with Rule 1(E) of Your Honor's individual practices, to request an extension of several dates in the case management plan that Your Honor signed on October 19, 2007. A copy of the existing Case Management Plan is enclosed, together with a copy of the proposed Revised Case Management Plan, which counsel for all parties have executed (and which we have filed via an electronic mailing to the Court's Orders and Judgments Clerk).

In essence, the requested changes would extend the deadline for completion of fact discovery from March 11, 2008 to July 11, 2008; and would extend the deadline for filing the pretrial order from April 15, 2008 to September 19, 2008. While the parties have already engaged in substantial discovery (i.e., interrogatories, admissions, and exchange of documents), these extensions have become necessary due to the complicated nature of this action, which has been amplified by the pendency of numerous parallel proceedings in other courts. The combined impact of those other cases was not anticipated at the time in which the case management plan was entered into in this case. Thus, while the parties have been actively and diligently engaged in discovery in this case, they simply require more time.

Colleen McMahon
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There has been no previous request for an adjournment of any of the dates in the case management plan by any party.

Respectfully submitted,

 by *moa*

Richard H. Markowitz

Enclosures

cc: Ryan P. Farley, Esq. (via facsimile and electronic mail w/ enclosure)
BUCHANAN INGERSOLL & ROONEY PC
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